

Scott E. Gizer, Esq., Nevada Bar No. 12216  
*sgizer@earlysullivan.com*  
Sophia S. Lau, Esq., Nevada Bar No. 13365  
*slau@earlysullivan.com*  
EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP  
8716 Spanish Ridge Avenue, Suite 105  
Las Vegas, Nevada 89148  
Telephone: (702) 331-7593  
Facsimile: (702) 331-1652

Kevin S. Sinclair, NV Bar No. 12277  
*ksinclair@sinclairbraun.com*  
SINCLAIR BRAUN KARGHER LLP  
15260 Ventura Blvd., Suite 715  
Sherman Oaks, California 91403  
Telephone: (213) 429-6100  
Facsimile: (213) 429-6101

Attorneys for Defendants  
CHICAGO TITLE INSURANCE COMPANY; FIDELITY  
NATIONAL TITLE GROUP, INC.; and TICOR TITLE OF  
NEVADA, INC.

DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

Janet Trost, Esq.  
501 S. Rancho Drive  
Suite H-56  
Las Vegas, Nevada 89106

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

## BANK OF AMERICA, N.A.,

Case No.: 3:20-CV-00046-MMD-WGC

**Plaintiff,**

VS

**CHICAGO TITLE INSURANCE  
COMPANY, et al.**

**STIPULATION AND ORDER  
CONTINUING DEADLINES TO  
RESPOND (ECF NOS. 82, 83, 84, AND  
91)**

## **SECOND REQUEST**

## Defendants.

COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”), Fidelity National Title Group, Inc., (“FNTG”) and Ticor Title of Nevada, Inc. (“Ticor Agency”) (collectively, “Defendants”) and plaintiff Bank of America, N.A. (“BANA”), by and through their respective attorneys of record, hereby agree and stipulate as follows:



1       1. On March 6, 2023, Chicago Title, FNTG, and Ticor Agency each filed their  
2 respective motions to dismiss BANA's complaint. (ECF Nos. 82, 83, and 84);

3       2. On April 3, 2023, BANA filed its responses to Chicago Title, FNTG, and Ticor  
4 Agency's motions to dismiss (ECF Nos. 89, 90, and 92) and filed a countermotion for partial  
5 summary judgment in response to Chicago Title's motion to dismiss (ECF No. 91);

6       3. On April 5, 2023 the Court granted the Parties' first stipulation extending the  
7 deadlines for Defendants to respond to the motions through and including May 10, 2023 (ECF  
8 No. 95);

9       4. Defendants request a thirty (30) day extension of their respective deadlines to  
10 respond to the motions, through and including Friday, June 9, 2023, to afford Defendants  
11 additional time to respond to the legal arguments set forth in BANA's responses and  
12 countermotion;

13       5. BANA does not oppose the requested extensions;

14       //

15       //

16       //

17       //

18       //

19       //

20       //

21       //

22       //

23       //

24       //

25       //

26       //

27       //

28       //

1       6. This is the second request for an extension which is made in good faith and not for  
2 purposes of delay;

3       **IT IS SO STIPULATED** that Defendants' respective deadlines to reply in support of  
4 their motions to dismiss and Chicago Title's deadline to oppose BANA's countermotion for  
5 partial summary judgment are hereby extended through and including June 9, 2023.

6       Dated: May 2, 2023

SINCLAIR BRAUN KARGHER LLP

7       By: /s/-Kevin S. Sinclair

KEVIN S. SINCLAIR

Attorneys for Defendants

CHICAGO TITLE INSURANCE COMPANY;  
FIDELITY NATIONAL TITLE GROUP, INC.;  
and TICOR TITLE AGENCY OF NEVADA,  
INC.

11      Dated: May 2, 2023

WRIGHT FINLAY & ZAK, LLP

12      By: /s/-Darren T. Brenner

DARREN T. BRENNER

Attorneys for Plaintiff

BANK OF AMERICA, N.A.

15       **IT IS SO ORDERED.**

16      Dated this 3rd day of May, 2023.



17      MIRANDA M. DU  
18      UNITED STATES DISTRICT JUDGE